

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 2 CASES LISTED IN
EXHIBIT 1 TO PLAINTIFFS' MOTION¹

JOSEPH R. GOODWIN U.S. DISTRICT
JUDGE

**NOTICE OF ADOPTION OF PRIOR *DAUBERT* RESPONSE REGARDING
JOYE K. LOWMAN, M.D. FOR WAVE 2**

Defendants Ethicon, Inc. and Johnson & Johnson (Ethicon) hereby adopt and incorporate by reference the *Daubert* response filed in relation to the general-causation opinions of Joye K. Lowman, M.D. for Ethicon Wave 1, Dkt. 2161. Ethicon respectfully requests that the Court deny Plaintiffs' motion, for the reasons expressed in the Wave 1 response briefing.

Dated: August 8, 2016

Respectfully submitted,

ETHICON, INC. AND
JOHNSON & JOHNSON

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¹ With two exceptions: (1) Pamela Bailey, Case No. 2:12-cv-01700, was implanted with a TVT device and is the subject of a separate *Daubert* motion (*see* Dkt. 2449); and (2) Margaret Frazier, Case No. 2:12-cv-01731, whose case has been dismissed.

/s/ David B. Thomas

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CERTIFICATE OF SERVICE

I certify that on August 8, 2016, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

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